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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH, Individually  
and as Parent and Legal Guardian of W.W.,  
K.W., G.W., and L.W., minor children, and  
MATTHEW WADSWORTH,

Plaintiffs,

v.

WALMART, INC. and JETSON  
ELECTRIC BIKES, LLC,

Defendants.

Case No.: 2:23-cv-00118-KHR

JURY TRIAL DEMANDED

**PLAINTIFFS' PROPOSED SPECIAL VERDICT FORM**

Pursuant to the Final Pretrial Order (Doc. 166), Plaintiffs, Stephanie Wadsworth, Individually and as Parent and Legal Guardian of W.W., K.W., G.W., and L.W., minor children, and Matthew Wadsworth, by and through their undersigned counsel, submit this proposed Special Verdict Form to be submitted to the jury in the above-captioned matter.

We, the jury, present the following answers to the questions submitted by the Court, to which we have all agreed:

1. Jetson Electric Bikes, LLC

(a) Did Jetson import, design, manufacture, distribute, or sell a defective hoverboard?

☐ Yes      ☐ No

Please continue to question 1(b).

(b) Did Jetson breach a warranty related to the hoverboard?

☐ Yes      ☐ No

Please continue to question 1(c).

(c) Did Jetson breach a duty to provide adequate warnings, instructions, or information regarding the hoverboard?

☐ Yes      ☐ No

Please continue to question 1(d).

(d) Was Jetson negligent?

☐ Yes      ☐ No

If your answer is “no” to all parts of question 1 above, please continue to question 2.  
If your answer is “yes” to any part of question 1 above, please continue to question 1(e).

(e) Was Jetson’s negligence, and/or breach of duty or warranty, and/or importation, design, manufacture, distribution, or sale of the hoverboard a cause of any Plaintiff’s injuries or damages?

☐ Yes      ☐ No

Please continue to question 2.

2. Walmart Inc.

(a) Did Walmart distribute or sell a defective hoverboard?

☐ Yes      ☐ No

Please continue to question 2(b).

(b) Did Walmart breach a warranty related to the hoverboard?

☐ Yes ☐ No

Please continue to question 2(c).

(c) Did Walmart breach a duty to provide adequate warnings, instructions, or information regarding the hoverboard?

☐ Yes ☐ No

Please continue to question 2(d).

(d) Was Walmart negligent?

☐ Yes ☐ No

If your answer is “no” to all parts of question 2 above, please continue to question 3.  
If your answer is “yes” to any part of question 2 above, please continue to question 2(e).

(e) Was Walmart’s negligence, and/or breach of duty or warranty, and/or distribution or sale of hoverboard a cause (substantial factor) of any Plaintiff’s injuries or damages?

☐ Yes ☐ No

Please continue to question 3.

3. Stephanie Wadsworth

(a) Was Stephanie Wadsworth negligent?

☐ Yes ☐ No

If your answer is “no” to question 3(a), please continue to question 4.  
If your answer is “yes” to question 3(a), please continue to question 3(b).

(b) Was Stephanie Wadsworth’s negligence a cause (substantial factor) of any Plaintiff’s injuries or damages?

☐ Yes ☐ No

If your answer is “no” to question 3(b), please continue to question 5.  
If your answer is “yes” to question 3(b), please continue to question 4.

## 4. Percentage of Fault

For any or all parties for whom you answered “yes” to questions 1(e), 2(e), or 3(b) above, enter their percentage of fault. (Your total must equal 100%.)

Jetson \_\_\_\_\_ %

Walmart \_\_\_\_\_ %

Stephanie Wadsworth \_\_\_\_\_ %

TOTAL: 100 %

Please continue to question 5.

## 5. Damages

(a) If you answered “yes” to questions 1(e) or 2(e), enter the amount of damages sustained by W.W., if any. Do not reduce these amounts by the percentages of fault you found.

Past Medical Expenses: \$ \_\_\_\_\_

Future Medical Expenses: \$ \_\_\_\_\_

Pain: \$ \_\_\_\_\_

Suffering: \$ \_\_\_\_\_

Emotional Distress: \$ \_\_\_\_\_

Disability or Disfigurement: \$ \_\_\_\_\_

Loss of Enjoyment of Life: \$ \_\_\_\_\_

Loss of Stephanie Wadsworth’s services, society, companionship, affection, love, advice, and/or guidance \$ \_\_\_\_\_

TOTAL: \$ \_\_\_\_\_

(b) If you answered “yes” to questions 1(e) or 2(e), enter the amount of damages sustained by K.W., if any. Do not reduce these amounts by the percentages of fault you found.

Pain: \$ \_\_\_\_\_

Suffering: \$ \_\_\_\_\_

Emotional Distress: \$ \_\_\_\_\_

Loss of Enjoyment of Life: \$ \_\_\_\_\_

Loss of Stephanie Wadsworth's services, society, companionship, affection, love, advice,  
and/or guidance \$ \_\_\_\_\_

TOTAL: \$ \_\_\_\_\_

(c) If you answered "yes" to questions 1(e) or 2(e), enter the amount of damages sustained by G.W., if any. Do not reduce these amounts by the percentages of fault you found.

Pain: \$ \_\_\_\_\_

Suffering: \$ \_\_\_\_\_

Emotional Distress: \$ \_\_\_\_\_

Loss of Enjoyment of Life: \$ \_\_\_\_\_

Loss of Stephanie Wadsworth's services, society, companionship, affection, love, advice,  
and/or guidance \$ \_\_\_\_\_

TOTAL: \$ \_\_\_\_\_

(d) If you answered "yes" to questions 1(e) or 2(e), enter the amount of damages sustained by L.W., if any. Do not reduce these amounts by the percentages of fault you found.

Pain: \$ \_\_\_\_\_

Suffering: \$ \_\_\_\_\_

Emotional Distress: \$ \_\_\_\_\_

Loss of Enjoyment of Life: \$ \_\_\_\_\_

Loss of Stephanie Wadsworth's services, society, companionship, affection, love, advice,  
and/or guidance \$ \_\_\_\_\_

TOTAL: \$ \_\_\_\_\_

(e) If you answered “yes” to questions 1(e) or 2(e), enter the amount of damages sustained by Stephanie Wadsworth, if any. Do not reduce these amounts by the percentages of fault you found.

Past Medical Expenses: \$ \_\_\_\_\_

Future Medical Expenses: \$ \_\_\_\_\_

Pain: \$ \_\_\_\_\_

Suffering: \$ \_\_\_\_\_

Emotional Distress: \$ \_\_\_\_\_

Disability or Disfigurement: \$ \_\_\_\_\_

Loss of Enjoyment of Life: \$ \_\_\_\_\_

TOTAL: \$ \_\_\_\_\_

(f) If you answered “yes” to questions 1(e) or 2(e), enter the amount of damages sustained by Plaintiff Matthew Wadsworth, if any. Do not reduce these amounts by the percentages of fault you found.

Loss of Stephanie Wadsworth’s services, society, companionship, affection, love, advice, and/or guidance \$ \_\_\_\_\_

TOTAL: \$ \_\_\_\_\_

Sign and date the verdict form and inform the Bailiff that you have reached your verdict.

Dated this \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Jury Foreperson

Date: February 24, 2025

/s/ T. Michael Morgan, Esq.

**T. Michael Morgan, Esq.\***

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*Counsel for Plaintiffs*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 24, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ T. Michael Morgan, Esq.

T. Michael Morgan, ESQ.\*

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*\*Admitted Pro Hac Vice*